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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER JAMES,

Defendant.

Case No. 3:16-cr-00027-MMD-VPC

**STIPULATION FOR EXTENSION OF TIME
TO RESPOND TO MOTION TO SUPPRESS
EVIDENCE (Doc. No. 28)**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by and through DANIEL G. BOGDEN, United States Attorney, SHANNON M. BRYANT, Assistant United States Attorney; LAUREN D. GORMAN, Assistant Federal Public Defender, counsel for Defendant, CHRISTOPHER JAMES, that the deadline for the government's response to the Motion to Suppress Evidence [Doc. No. 28], which is currently October 21, 2016, be continued to November 2, 2016.

This Stipulation is entered into for the following reasons:

1. Counsel for the United States of America was out of office and outside of the continental United States from October 6, 2016 until October 19, 2016, when he returned to the office. The instant Motion was filed on October 7, 2016 during counsel's absence. Counsel for the United States of America has therefore been unable to prepare a timely response to Defendant's Motion and requires the additional time to do so.

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1 2. Denial of this continuance could result in a miscarriage of justice.

2 3. This is the first request to extend the deadline for the government's response to the
3 Motion to Suppress Evidence [Doc. No. 28], in the above-captioned matter.

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5 DATED: October 19, 2016,

6 DANIEL G. BOGDEN
United States Attorney

7 /s/ Shannon M. Bryant

8 SHANNON M. BRYANT
Assistant United States Attorney

9
10 /s/ Lauren D. Gorman

11 LAUREN D. GORMAN
Assistant Federal Public Defender
Attorney for Defendant

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER JAMES,

7 Defendant.

Case No. 3:16-cr-00027-MMD-VPC

**FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND ORDER**

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9 **FINDINGS OF FACTS AND CONCLUSIONS OF LAW**

10 Based on the pending Stipulation of counsel, and good cause appearing, the Court finds that:

11 1. Counsel for the United States of America was out of office on leave from October 6,
12 2016 until October 19, 2016, when he returned to work. Defendant's Motion was filed on October 7,
13 2016, during counsel's absence, and the government has been unable to prepare a timely response to the
14 Motion and requires additional time to do so.

15 2. Denial of this continuance could result in a miscarriage of justice.

16 3. This is the first request to extend the deadline for the government's response to the
17 Motion to Suppress Evidence [Doc. No. 28], in the above-captioned matter.

18 4. For all the above-stated reasons, the ends of justice would be served by granting an order
19 that the deadline to file government's response to the Motion to Suppress Evidence [Doc. No. 28], which
20 is currently October 21, 2016, be extended to November 2, 2016.

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ORDER

IT IS THEREFORE ORDERED that the government's response to the Motion to Suppress Evidence [Doc. No. 28], which is currently October 21, 2016, be continued to November 2, 2016.

DATED this 20th day of October, 2016.

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

MIRANDA M. DU
UNITED STATES DISTRICT JUDGE